

ETEXT ATTACHMENT

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02/19/2003 17 : 06

February 19, 2003

Scott Walker

Senior Campaign Finance Analyst

Reports Analysis Division

Federal Election Commission

999 E Street, N.W.

Washington, D.C. 20463

Identification Number: C00003418

RE: Amended February Monthly Report (01/01/02-01/31/02)

Dear Mr. Walker:

This correspondence is in response to your "Request For Additional Information" ("RFAI"), resulting from the Republican National Committee's ("RNC") "Amended February Monthly Report (01/01/02-01/31/02)" dated May 22, 2002.

With regard to refund of an allocable expenses, the RNC transferred \$1094563.83 on December 20, 2002 from the RNC's Federal to the Non-Federal account which included \$3182.04 for the non-federal share of these refunds.

On Schedule H4, an In-kind transfer was incorrectly marked as "Administrative" activity. It has been corrected to indicate "Direct Fundraising", the event has been identified and the report has been amended. Up to the point of this report, our new electronic filing software did not include the logic to indicate In-kind transfers as "Direct Fundraising" activity. The software has been revised to do so in the future.

We have corrected and filed the amended Schedule H4 to correctly indicate the purpose of disbursements that had previously indicated trans or supplies.

To clarify expenditures listed for Radio Time, Video Production, Telemarketing, Ad Costs, Media Costs, Advertising, Satellite Time, Video or Broadcast Costs are RNC operating costs. None of these expenditures are Candidate specific. They are either generic overhead costs or RNC fundraising costs. This note is attached to all filings that include these costs.

Regarding Year-to-date calculation, the In-kind transfers mentioned above accidentally had activity indicated as "Administrative". This would explain how the year-to-date aggregate would not total correctly. Please note, otherwise the disbursement documentation was complete and the totals were reported accurately. The records in question have been corrected and the report has been amended.

Regarding Schedule I, I find that the current FECPrint program reports different numbers than your letter indicated. It shows line 1 receipts of 2374381.40 and line 5 disbursements of 406800.77. This accurately represents our itemized transactions.

With regard to the "usual and normal charge" for fees received from a federal candidate on Schedule A supporting Line 15, the RNC charges fair market value for services it provides. For example, attendance at political conferences presented by RNC. The charge is determined based upon those for similar political conferences. A typical comparison would be the FEC that charges \$385 for a two day conference and \$25 for an hour and a half round table event.

Schedule B supporting Line 21(b) of this report includes payments to another political committee. With regard to the "usual and normal charge", we are assured the fee is a commercially reasonable rate because we regularly obtain similar services from a variety of sources both political and commercial.

I trust this response answers your inquiry. However, if you need further clarification please do not hesitate to contact me.

ETEXT ATTACHMENT

Sincerely,

Pat Huyck

Director of Accounting

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